

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

UNITED STATES OF AMERICA

v.

MARK THOMAS RENO

Case No. 3:22-MJ- 2126

Filed Under Seal

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

I, Jessi Mann, being duly sworn, do depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent ("SA") with the Federal Bureau of Investigation ("FBI"). I have been in this position since January 2021 when I completed new agent training at the FBI Academy in Quantico, Virginia. I am assigned to the Knoxville Division of the FBI within the Counterterrorism Branch. During my time as a Special Agent, I have conducted and participated in a variety of investigations, including international and domestic terrorism investigations. As part of my duties, I have participated in the execution of federal search and arrest warrants. As a Special Agent, I am authorized by law or by a Government agency to engage in or supervise the prevention, detection, investigation, or prosecution of a violation of Federal criminal laws.

2. I make this affidavit in support of a criminal complaint and arrest warrant against Mark Thomas Reno ("RENO") for a violation of 18 U.S.C § 1361 (Destruction of Government Property). Based on my training and experience with the FBI, I am familiar with various criminal statutes, including 18 U.S.C § 1361.

3. The information contained in this affidavit is known to me through personal knowledge and information received from other law enforcement personnel. As this affidavit is being submitted for the limited purpose of obtaining a criminal complaint and arrest warrant, I

have not included each and every fact known to me concerning this investigation. I have instead set forth facts that I believe are sufficient to establish probable cause for the Court to authorize a criminal complaint and arrest warrant against RENO.

4. Title 18, U.S.C. § 1361 provides in relevant part:

Whoever willfully injures or commits any depredation against any property of the United States, or any department or agency thereof...shall be punished as follows: If the damage or attempted damage to such property exceeds the sum of \$1,000, by a fine under this title or imprisonment for not more than ten years, or both.

PROBABLE CAUSE

5. On April 26, 2022, a law enforcement officer in an undercover capacity ("Officer-1"), working on an ongoing investigation, met in-person with RENO at a public gathering in Knoxville. RENO had previously met with Officer-1 in January 2022 at another public event in Knoxville.

6. During the April 26, 2022 meeting with RENO, Officer-1 was wearing a video and audio recording device, which device surreptitiously recorded RENO. Among other things, RENO told Officer-1 that he (RENO) was part of a group called the Church Militant Resistance. Open-source information identified the Church Militant Resistance as local chapter of the Church Militant, whose mission is to resist actions that oppose the Catholic Orthodoxy and/or decency.

7. During the video and audio recorded statement on April 26, 2022, which I have reviewed, RENO made a number of statements about identifying targets and destroying property, including government buildings. In substance and in part, RENO told Officer-1: "I mean, we have plenty of targets ... there should be no Department of Education ... federally speaking, all education is done by the states so why the Feds in on it at all...Department of uh, Energy – don't

need it ... I mean, I me – I mean, the government's here for de – for defense, roads, and privacy of communication. ... that's all that it's ... entitled to in the constitution...it's not entitled to do anything else ... get rid of it all ... Fuck. It ain't gonna happen ... How we gonna -- well you're not gonna get the genie in the bottle ... You're not getting the genie back in the bottle ... So – it's fucking war ... it's war to the end now.”

8. During the same surreptitiously recorded conversation on April 26, 2022, RENO also admitted to being at the attack on the Capitol Building on January 6, 2021, and using multiple tactics to avoid detection, to include a fake walking cane, not bringing his phone, and wearing glasses. RENO further stated you should not bring your phone if you are going to do something illegal because the government can track you.

9. Based on my review of photographs from the January 6, 2021 attack on the Capitol Building, I know that RENO was, in fact, present outside the Capitol Building on January 6, 2021. Moreover, and corroborating RENO's own statements, RENO can be seen holding a walking cane and wearing glasses outside the Capitol Building on January 6, 2021.¹ To date, we have found no evidence that RENO entered the Capitol or otherwise committed a criminal act on January 6, 2021.

¹ RENO stated “I was there on January 6 ... I don't sleep so good ... you know, them motherfuckers come for me ... they ain't gonna take me alive ... I'm not gonna – I told you I'm - I'm - I'm – uh, what is it called – um ... afraid of tight spaces ... I'm claustrophobic ... I can't - I - I -- and I'm not gonna be – and I'm not gonna be treated like them motherfuckers, too. They've been there for over a year now – Fifteen months now ... Huh-uh, I'll kill 'em ... Th - They'll kill me ... But I'm gonna kill a bunch of them. How many am I allowed ... before they get me – because, once we get going, we're dead men ... So – So what – yeah – so, now what can you do before you're dead ... and really, I'm – I've come to that point. I'm – I'm gonna be a dead man here, pretty soon, so – No, not by – they're gonna be after my ass. I can't let somebody do this by themselves ... Somebody's gonna have to fucking do something. ...

10. On June 13, 2022, the Honorable Jill E. McCook, United States Magistrate Judge for the Eastern District of Tennessee, authorized a search warrant to track RENO's black 2012 Ford Fusion ("Vehicle-1") and RENO's red 2006 GMC Sierra truck ("Vehicle-2"). Both Vehicle-1 and Vehicle-2 are registered to RENO at RENO's address (the "RENO Residence").

11. From on or about April 20, 2022 until on or about June 27, 2022, RENO was placed under physical surveillance approximately 19 times with each surveillance shift lasting between four and eight hours. RENO's wife was observed as a passenger in Vehicle-1 and Vehicle-2 approximately three times. RENO was the only individual observed driving Vehicle-1 and Vehicle-2 during surveillance.

12. On July 3, 2022, a security guard (the "Security Guard") was working a day shift at the John J. Duncan Federal Office Building in Knoxville, Tennessee (the "Federal Building"). At approximately 1:45 PM, while heating up his lunch in the first-floor break room, the Security Guard heard two loud bangs emanating from the front lobby area of the Federal Building. The Security Guard immediately returned to the lobby of the Federal Building and observed damage to two lower adjacent windows facing Locust Street. The Security Guard next left the lobby and quickly proceeded to the rear exit door facing West Church Street. The Security Guard exited the building and walked to Locust Street to assess the damaged windows. The Security Guard observed two broken windows in the lobby area and a third broken exterior window in the Internal Revenue Service ("IRS") office of the Federal Building. The damaged window in the IRS office was also facing Locust Street and approximately 20 feet north of the damaged lobby windows. All of the damaged windows were double paned. The exterior pane on each of the three windows had a discernable point of impact with radiating cracks from the point of impact to the window frame. The interior pane of each of the affected windows was undamaged.

13. An employee and contract project manager for the Federal Building indicated that the estimated cost to repair the damaged windows was approximately \$5,440.

14. On or about May 13, 2022, a pole camera was installed in the vicinity of the RENO Residence. Since the installation of the pole camera, it does not appear that anyone other than RENO and RENO's wife reside at the RENO Residence. On July 3, 2022, at approximately 10:51 AM, Vehicle-1 departed the RENO Residence. A review of the pole camera footage for this date and time revealed that the driver appeared to be the sole occupant of Vehicle-1.

15. On July 3, 2022, at approximately 11:16 AM, Vehicle-1 was captured by a license plate reader ("LPR") camera located in the vicinity of Asheville Highway at John Sevier in Knox County. The Vehicle-1 driver appeared to be the sole occupant of Vehicle-1. In the photograph there appears to be a white fedora style hat resting on the ledge below the rear window on the driver's side of Vehicle-1.

16. On July 3, 2022, at approximately 11:26 AM, the Vehicle-1 tracking device placed Vehicle-1 in the vicinity of the Bank of America Financial Center located at 550 West Main Street, Knoxville, TN.

17. On July 3, 2022, at approximately 11:27 AM, a security camera on the Federal Building captured a dark colored sedan with a white object resting on the ledge below the rear window on the driver's side of the vehicle—the dark colored sedan captured in the surveillance video appears to be Vehicle-1 based on the color, body type, and the white object resting on the ledge below the driver's side window. Vehicle-1 was traveling westbound on Cumberland Avenue and making a left turn onto Locust Street.

18. On July 3, 2022, at approximately 11:32 AM, the tracking device for Vehicle-1 placed Vehicle-1 in the vicinity of the United States Attorney's Office in downtown Knoxville.

Vehicle-1 remained in this location for approximately two minutes before departing and traveling to a church attended by RENO, arriving at approximately 11:47 AM. Less than two hours later, at approximately 1:37 PM, the tracking device showed Vehicle-1 traveling southbound on North Central Street in the direction of downtown Knoxville. Several minutes later, at approximately 1:43 PM, the tracking device showed Vehicle-1 in the vicinity of West Church and Locust Street, approximately one block north of the Federal Building. Vehicle-1 remained in this location for approximately two minutes.

19. At approximately 1:45 PM, the tracking device placed Vehicle-1 adjacent to the Federal Building on Locust Street. Also, at 1:45 PM, a security camera on the Federal Building captured Vehicle-1 traveling southbound on Locust Street. Vehicle-1 decreased its speed briefly in the vicinity of the first damaged window in the IRS office. The image of Vehicle-1 in this position was partially obscured by tree foliage. Vehicle-1 next accelerated and then immediately slowed to a brief stop in the vicinity of the second and third damaged windows in the lobby of the Federal Building. As Vehicle-1 was decelerating to a stop, what appeared to be an object pointing in the direction of the damaged lobby windows was briefly extended and then retracted through the driver's side window. Finally, Vehicle-1 accelerated towards the traffic light on the corner of Locust Street and Cumberland Avenue. Based on my training and experience, as well as my participation in this investigation, it appears that RENO fired a projectile out of Vehicle-1 to destroy the windows in the Federal Building.

20. On July 3, 2022, at approximately 1:45 PM, a security camera on the Federal Building captured Vehicle-1 traveling southbound on Locust Street and making a left turn onto Cumberland Avenue. Vehicle-1 was traveling in the wrong direction on a one-way street. At approximately 1:45 PM, a security camera on the Federal Building captured Vehicle-1 traveling

northbound on Walnut Street passing the entrance to the Federal Building parking garage. One minute later, at approximately 1:46 PM, a security camera inside the Federal Building captured the Security Guard exiting the rear doors facing West Church Street. A security camera on the Federal Building captured the Security Guard walking towards Locust Street, parallel to West Church Street, along the side of the Federal building. After the Security Guard reached the Locust Street side of the Federal Building, he turned left and walked out of view from the camera. Vehicle-1 is captured traveling southbound on Locust Street. Vehicle-1 noticeably reduced speed when it was likely in view of the Security Guard. One minute later, at approximately 1:47 PM, a security camera on the Federal Building captured Vehicle-1 traveling southbound on Locust Street and making a right turn onto Cumberland Avenue.

21. On July 3, 2022, at approximately 1:55 PM, the tracking device placed Vehicle-1 in the vicinity of I-40 and Asheville Highway in East Knox County. At approximately 1:56 PM, an LPR camera captured Vehicle-1 in the vicinity of Asheville Highway at John Sevier Highway in Knox County.

22. On July 3, 2022, at approximately 2:23 pm, the Vehicle-1 tracking device placed Vehicle-1 at the RENO Residence. A review of location history for RENO's cell phone revealed that his cell phone remained in Jefferson City, TN on July 3, 2022, which is consistent with RENO's statement to Officer-1 that RENO does not take his cell phone in order to avoid detection.

CONCLUSION

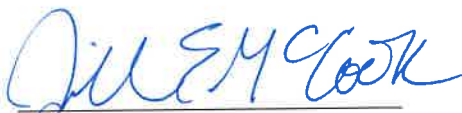
23. Based on the foregoing, I respectfully submit that there is probable cause to believe that, within the Eastern District of Tennessee, RENO has violated 18 U.S.C. § 1361 (Destruction of Government Property).

Respectfully submitted,



Jessi Mann
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on July 15, 2022.



Hon. Jill E. McCook
United States Magistrate Judge